SOUTH AFRICA

Project: Phasing out of lead in paint and the development of an action plan for SAICM emerging contaminants (lead in paint, HHPs, EPPPs, EDCs, & Cd)

Second Independent Assessment of the Closed Projects under the Special Programme Report (December 2024)

RESULTS

Implementing partner: Department of Health (DoH) (specifically, its Department of Environmental Health)

Agreement timeframe: 30 Apr 2020 – 31 Jul 2023 (initially to 30 Sep 2022, with 1 Amendment)

Budget: 245,000 USD

Overall Assessment

The project achieved all its planned measures and advanced across the relevant Core Indicator Criteria. It strengthened the chemicals management framework by conducting comprehensive studies to identify cost-effective alternatives, developing the National Implementation Plan (NIP) for managing and phasing out emerging contaminants, and supporting the revision of lead regulations to meet international standards. The project enhanced national capacity through targeted training for border officials, regulatory enforcement, and community sensitization, reaching key stakeholders and vulnerable groups. Additionally, it strengthened multi-stakeholder coordination mechanism by introducing a web-based platform for efficient communication and progress tracking. While the project achieved substantial outputs, a gap remains in the formal adoption process, particularly concerning the NIP.

Results & progress by Core Indicator Criteria

The project covered five of the existing eight Core Indicator Criteria, namely:

Criterion 1.1: Level of development of national chemical/waste database

RATING

- 0 No database or registry
- 1 Database or registry covering 1 Multilateral Environmental Agreement (MEA)
- 2 Database or registry covering 2 MEAs
- 3 Database or registry covering 3 MEAs
- 4 Database or registry covering 4 MEAs
- 5 **Database or registry covering 4 MEAs and SAICM**

SPECIFIC RESULTS:

The project conducted a comprehensive study[1] to identify cost-effective and environmentally benign alternatives, as well as alternative technologies, for addressing emerging contaminants. The study supported the development of a more robust chemical/waste database by collecting and analyzing existing data, complemented by information from companies suspected of using chemicals of concern. This enhanced data availability improved monitoring and informed policy decisions.

Criterion 1.2: Level of necessary for chemical/waste management expertise

RATING

0 No knowledge or expertise available

1 Not enough personnel in at least one priority Ministry, Department or Agency have basic training in chemical and/or waste management

2 Enough personnel in at least one priority Ministry, Department or Agency have basic training in Chemical and/or waste management

3 Enough personnel from 1 or 2 Ministry, Department or Agency have been trained in chemical and /or waste management and know how to apply it into country planning

4 **Enough personnel in 3 or 4 Ministries, Departments or Agencies have been trained in chemical and/or waste management and can transfer their knowledge to colleagues for day-to-day use**

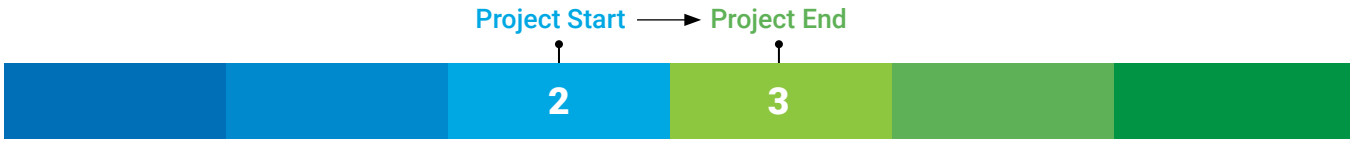
5 All the required personnel have necessary expertise and can integrate chemical management into the development planning process

SPECIFIC RESULTS:

- The project focused on awareness-raising and education campaigns targeting border officials, representatives from the Department of Agriculture, Land Reform, and Rural Development, and local communities. A total of nine workshops were conducted at key locations to educate participants on the safe handling and management of hazardous chemicals, as well as the environmental and human health impacts of chemicals, such as leaded paint, hazardous pesticides, and other emerging contaminants.
- The project emphasized capacity building for regulatory enforcement and compliance, especially of the newly established Border Management Agency, created under the Border Management Act signed into law in 2020. This agency consolidated border control responsibilities under a single management structure, replacing the sectoral approach previously used by individual departments at ports of entry. The project developed training materials for the agency officials, provided handheld XRF analyzers for early detection of lead in paint, and conducted training sessions to enable officials to identify controlled and banned substances and conduct inspections effectively. These activities ensured compliance with permit and regulatory requirements for locally manufactured, imported, and exported products, strengthening enforcement and compliance measures and improving overall border management coordination and efficiency.

Criterion 1.4: Level of development of multi-stakeholder coordination mechanism for chemical/waste management

RATING



0 There was no multi-stakeholder coordination mechanism

1 There was a multi-stakeholder coordination mechanism with very limited and irregular participation from Government and non-Government bodies

2 **There was a multi-stakeholder coordination mechanism with more regular and structured participation from Government and non-Government bodies**

3 **There was a multi-stakeholder coordination mechanism with regular meetings and adequate participation from Government and non-Government bodies**

4 There was coordinated planning and a common knowledge exchange mechanism in addition to a multi-stakeholder coordination mechanism with regular meetings and adequate participation from Government and non-Government bodies

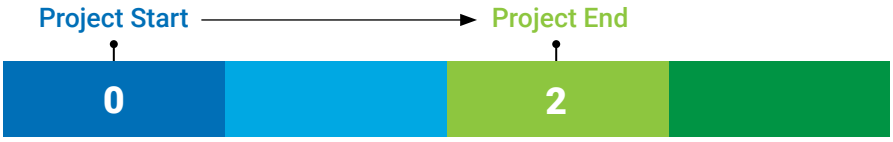
5 The multi-stakeholder coordination mechanism reached full maturity with full participation from all Governmental and non-Governmental stakeholders and a joint community of practice

SPECIFIC RESULTS:

The project strengthened the earlier established Multi-Stakeholder Committee on Chemicals Management (MCCM) by actively engaging it to review project documents and provide guidance through its quarterly meetings. It also facilitated the formation of a subcommittee composed of technical experts from academia and research institutions, which conducted specialized technical work, such as addressing emerging contaminants and supporting project activities. To further enhance coordination, the project introduced a web-based platform that enabled stakeholders to share documents, provide feedback, and track progress efficiently.

Criterion 2.1: Level of development and implementation of chemical/waste management policy, plan or strategy

RATING



0 **There was no strategy, policy or plan**

1 The strategy, policy or plan was proposed

2 **The strategy, policy or plan was adopted**

3 The strategy, policy or plan was in place and being implemented

SPECIFIC RESULTS:

- The project facilitated the development of the National Implementation Plan (NIP) for the management and phasing out of emerging contaminants in South Africa, which was adopted at the technical level. The NIP outlined specific measures, including the development of specific regulations, to address pollutants such as endocrine-disrupting chemicals (EDCs), highly hazardous pesticides (HHPs), lead in paint, cadmium, and environmentally persistent pharmaceutical pollutants (EPPPs).
- The NIP was informed by extensive stakeholder consultations and by key studies conducted under the project[2]. These included an assessment of national infrastructure, institutional capacity, and legislation, which identified gaps and opportunities for improvement, and a costbenefit analysis examining the socio-economic impacts of phasing out lead in paint and cosmetics. The "Report on Safer Alternatives" further supported the identification of environmentally benign solutions.

Criterion 2.3: Level of development of regulatory framework/secondary legislation

RATING

0 **Nothing was done**

1 The relevant authority proposed to develop regulations

2 The regulations were adopted

3 **The regulations were in place and being implemented**

SPECIFIC RESULTS:

- The project supported the development of regulations, including the phasing out of lead, to strengthen chemicals and waste management in South Africa as part of associated domestic measures. Key achievements included the revision of lead in paint regulations, setting the permissible lead concentration to 90 ppm, and the designation of lead as a hazardous substance. These regulations were complemented by a grace period to ensure compliance by manufacturers, suppliers, and retailers.
- The project also supported the enforcement of these regulations through the procurement and training on the use of handheld XRF analyzers for lead detection at ports of entry, ensuring compliance with import and export standards. Additionally, the project enhanced regulatory frameworks by informing policy through studies like the cost-benefit analysis and assessments of institutional capacity and legislation.

FACTORS AFFECTING PERFORMANCE

Gender: The project was gender responsive as it incorporated gender considerations into its design and implementation and addressed the differentiated risks and impacts of chemical exposure on women and vulnerable populations in its deliverables. Awareness-raising initiatives highlighted the linkages between chemical exposures and gender-specific health and environmental effects. Specific efforts included training of women working on farms, as well as engaging female border management officials in capacity-building sessions - approximately 46% or more of participants in workshops, trainings, and other capacity-building activities were women. Furthermore, the multi-stakeholder approach ensured the representation of women in policy development and decision-making processes, and equitable participation across genders.

COVID-19: The project was moderately impacted by the pandemic, leading to delays in some activities and necessitating an amendment to the PCA.

SUSTAINABILITY

The project results are **fully maintained** due to the following:

- According to key informants, the sustainability of the project's results is evident through the continued functioning of structures established during the project. The National Implementation Plan (NIP) for managing emerging contaminants is being implemented, and the MCCM remains active in delivering on its work programme. Furthermore, the government has procured additional portable XRF instruments, now deployed at various border posts to enhance regulatory enforcement. Ongoing training for border officials on the use of XRF devices and broader chemical awareness initiatives further supports the continuity of capacity-building efforts.

RATING
After the End of the Project

Results **not** maintained

Results **partially** maintained

Results **mostly** maintained

Results **fully** maintained

LESSONS LEARNED

Scientific research enhances credibility and effectiveness of regulations: Involving experts from research institutions provided evidence-based insights for regulatory frameworks. This approach informed policy decisions, supported public awareness campaigns, and ensured the adoption of environmentally benign and cost-effective alternatives.

Capacity building ensures long-term compliance and enforcement: Training customs and border officials and equipping them with handheld XRF analyzers improved the enforcement of lead in paint regulations.

[1] *Life cycle analysis and baseline information on SAICM emerging contaminants in South Africa, conducted by the Department of Environment, Forestry, and Fisheries, 26 March 2021.*

[2] *The NIP development was additionally informed by the inventory of emerging contaminants conducted under domestic measures.*